

EXHIBIT 18

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June 30, 2025

VIA ELECTRONIC MAIL

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Re: COEYMANS MARINE TOWING, LLC D/B/A CARVER MARINE TOWING as
Owner and Operator of M/T Mackenzie Rose (IMO No. 8968765), etc.
United States District Court, Eastern District of Virginia, Case No. 2:24-cv-00490

Dear Mr. Rodgers:

I write to follow up on Carver's Fourth Supplemental Responses to the Belt Line's First Requests for Production, Fifth Supplemental Responses to the Belt Line's Second Requests for Production, and Affidavit of Mr. Malik. Upon review, the Belt Line has been unable to locate certain documents responsive to its Requests and required by the Court's Order (Doc. 50).

Carver's Responses to the 1st RFPs

Pursuant to the Order, Carver's objections to the 1st RFP's Nos. 4, 16, 17, 20, 21, 22, 33, and 34 were overruled and Carver was directed to provide full responses to the same. As of the date of this letter, the Belt Line is unable to locate the following documents:

Request No.	Information Sought	Missing Information
4	Course, position, and speed of the M/T MACKENZIE ROSE.	Original Rose Point Server data was not produced. CARVER907 contains a limited screen recording with no audio.

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16	Log books of the M/T MACKENZIE ROSE for January 1, 2024 through September 15, 2024.	Missing rough logs from July 25-September 15, 2024. Rough logs were produced only from January 1-July 24, 2024. Also missing Master's Daily Vessel Reports from January 1-June 10, 2024 and June 21-September 15, 2024.
17	Reports of displacement, drafts, trim, or list of M/T MACKENZIE ROSE from June 10-20, 2024.	Missing Reports of Displacement from June 10, 11, 17- 20, 2024.
34	Communications post-allision between the crew members and any government entity.	Missing crew communications from June 15-July 1, 2024.

Additionally, upon review of more recent productions, CARVER ESI 000583 references a master file compiled by Jason Galioto for production to the United States Coast Guard. This information would be responsive to 1st RFP No. 30. The Belt Line has not yet received this master file or any indication of its contents.

Carver has indicated through Mr. Maliks affidavit that its production is. If Carver has produced these documents, please identify their bates numbers.

Carver's Responses to the 2nd RFPs

Pursuant to the Order, Carver's objections to the 2nd RFP Nos. 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, and 14 were overruled and Carver was directed to provide full responses to the same. As of the date of this letter, the Belt Line is unable to locate the following documents:

Request No.	Information Sought	Missing Information
3	Documents relating to James Morrissey's training from Carver from January 1, 2020 to present.	Missing training information from March 2024 through June 2024.
4	Documents relating to the disciplinary history of James Morrissey.	Missing information from before the allision.
11	Documents evidencing training relating to the steering, navigation, and autopilot system on the M/T MACKENZIE ROSE from January 1, 2020 to present.	CARVER 911-941 were identified in Carver's June 10, 2025 letter but not produced to the Belt Line on April 25, 2025.

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Documents Identified in Depositions

On May 5, 2025, the Belt Line sent a letter regarding specific documents identified in the depositions of Carver's current and former employees that are responsive to the Belt Line's discovery requests. The Belt Line remains unable to locate the following documents outlined in that letter:

Relevant RFP	Document description	Missing Information
1 st RFP No. 30 & 34	Communications to/from Mr. Baldassare's work cell phone on June 15-20, 2024, including texts, emails, photographs, videos and phone call logs	Missing any information from Mr. Baldassare's work cell. Carver has been promising the Belt Line this cell data for months.
1 st RFP No. 30 & 34	Communications to/from Mr. Moore's work cell phone on June 15-20, 2024, including texts, emails, photographs, videos and phone call logs	Missing any information from Mr. Moore's Cell.
1 st RFP No. 30 & 34	Communications between Mr. Moore and Mr. Baldassare relating to CG-2692 form, including drafts, texts, emails, photographs, videos and phone call logs	Missing other communications not included in emails.


If Carver believes the documents have been produced, kindly provide the bates numbers.

Answers to Second Set of Interrogatories and Third Set of Requests for Production

Carver served its Answers to the Belt Line's Second Set of Interrogatories and Responses to Third Set of Requests for Production on June 20, 2025. Carver withdrew its objections to both sets of discovery requests yet still provided no information or documents. Instead, Carver merely stated "we are currently searching for the documents responsive to this request." Please provide full and complete answers and responses to all the Belt Line's discovery requests no later than **July 2, 2025**.

If you have any questions or concerns, please do not hesitate to contact our office.

Very truly yours,


James L. Chapman, IV

JLC/mda
cc: Counsel of Record